UNITED STATES DISTRICT COURT EASTERN DISTRICT OF NEW YORK

ELIANA GALAN and CAROLINA GUERRERO,

No. 18-cv-02603-JO

Plaintiffs,

NOTICE OF

CARLOS SEGARRA; LUZMILA SEGARRA; JUAN

MOTION

CARLOS SEGARRA; CHIFLEZ CORP; and COSITAS RICAS ECUATORIANAS CORP. d/b/a EL PEQUENO

COFFEE SHOP;

- against -

Defendants.

PLEASE TAKE NOTICE that upon the Declaration of Mohammed Gangat, Esq. (and supporting exhibits), the Memorandum of Law in support, and all prior papers and proceedings herein, Plaintiffs Carolina Guerrero and Eliana Galan shall move this Court, before the Honorable James Orenstein, United States District Judge, in the District Court for the Eastern District of New York, 225 Cadman Plaza East, Brooklyn, New York, 11201, on such date and time as the Court shall determine for an order: (i) reconsidering the Court's Order, dated September 13, 2019, and reissuing that Order to expressly state that the Court retains jurisdiction to enforce the settlement agreement entered into in this action for a period of not longer than sixty days following dismissal; and (ii) awarding the plaintiffs a judgment against the defendants in the amount of \$25,000 with prejudgment interest, plus \$3,920 in attorneys' fees, or in the alternative reinstating this action and allowing the plaintiffs to continue prosecuting the action against and for other and further relief as this Court deems just and proper.

Dated: New York, New York October 10, 2019

LAW OFFICE OF MOHAMMED GANGAT

By:

Mohammed Gangat, Esq.

675 3rd Avenue, Suite 1810 New York, NY 10017

(718) 669-0714

mgangat@gangatllc.com